

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>TROY E. TILLERSON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.:</b>
	)	<b>3:05-cv-985-MEF</b>
<b>THE MEGA LIFE AND HEALTH</b>	)	
<b>INSURANCE CORPORATION, a corporation;</b>	)	
<b>TRANSAMERICA LIFE INSURANCE</b>	)	
<b>COMPANY F/K/A PFL LIFE INSURANCE</b>	)	
<b>COMPANY, a corporation; NATIONAL</b>	)	
<b>ASSOCIATION FOR THE SELF EMPLOYED</b>	)	
<b>A/K/A NASE, a corporation;</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S RENEWED MOTION FOR ENLARGEMENT OF DISCOVERY  
DEADLINES**

Comes now the Plaintiff, Troy Tillerson, by and through his undersigned counsel of record, and hereby requests this Honorable Court to enlarge the discovery deadline that was set by this Court on February 7, 2007. As grounds in support of said request, Plaintiff states as follows:

1. On February 7, 2007 Plaintiff filed a motion for enlargement of discovery deadlines. In said motion, Plaintiff's counsel failed to suggest to the Court a time period in which to extend said deadlines.
2. The Honorable Terry F. Moorer granted Plaintiff's request on February 7, 2007 and extended the discovery deadlines in this case an additional ten (10) days until February 19, 2007.
3. While Plaintiff's are grateful to the Court for the extension, Plaintiff's counsel is in need of additional time.

4. This counsel is expecting the arrival of his fourth child in the next two weeks. While the specific date is unknown, counsel has been informed that if he wishes to be present for the birth (which he most certainly does) that he needs to remain locally for the next two weeks.

5. The contemplated depositions of Defendants will take place at the corporate offices in Texas. Additionally, it is anticipated by this counsel that there may be multiple witnesses proffered in order to satisfy the subjects designated in the notices of deposition. It is unknown at this time how many days the depositions will last before completion.

6. Counsel for Plaintiff has conferred with counsel for Defendants and both are in agreement that an extension of sixty (60) days would be a reasonable time in which counsel for Plaintiff to complete his familial obligations and thereafter take and complete the depositions of the Defendants.

7. Counsel for Defendants has no objection to an extension of the discovery deadlines for an additional sixty (60) days.

8. No party will be prejudiced by the granting of such an extension.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Honorable Court to grant an enlargement of discovery deadlines for an additional sixty (60) days.

RESPECTFULLY SUBMITTED this the 9<sup>th</sup> day of February, 2007.

s/Steve W. Couch  
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Attorney for Plaintiff

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2007, I electronically filed the foregoing with the clerk of the court using the CM/ECF system which will send notification to such filing to the following:

James W. Lampkin, II  
Pamela A. Moore  
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s/Steve W. Couch  
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Attorney for Plaintiff